



July 8, 2014

VIA ELECTRONIC COMMENT FILING SYSTEM

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Suite TW-A325
Washington, D.C. 20554

VIA ELECTRONIC MAIL

Chelsea H. Fallon, Assistant Chief (Chelsea.Fallon@fcc.gov)
John Emmett, GIS Specialist (John.Emmett@fcc.gov)
Industry Analysis & Technology Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**RE: TriCounty Telephone Membership Cooperative's (SAC 230505)
Response to Notice of Study Area Boundary Overlaps;
WC Docket Nos. 10-90 and 05-337**

Dear Ms. Dortch, Ms. Fallon, and Mr. Emmett:

This letter constitutes TriCounty Telephone Membership Cooperative's ("TriCounty") response to the June 20, 2014 notice from the Federal Communications Commission ("FCC") Wireline Competition Bureau of at least one overlap between TriCounty's study area (Study Area Code 230505) and that of a neighboring incumbent local exchange carrier ("ILEC").

TriCounty has reviewed the FCC's map of the current study area boundaries posted online at <http://apps.fcc.gov/wcb/sabdata/> and has identified the neighboring ILEC involved in the overlap as Carolina Telephone and Telegraph Company, LLC, dba Centurylink, Study Area Code 230470; the map identifies 18 areas of overlap, with a total area of 9.75974 square miles.

TriCounty utilizes the MapCom M4 Software Solutions Suite, a geographically correct visual operations platform, to manage our OSP networks. Our maps were developed from shapefile data from the NC county GIS land based maps and certifies that TriCounty's boundary is correct with respect to each of the identified areas of overlap with Carolina Telephone and

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Telegraph, LLC dba Centurylink. However, TriCounty realizes that the Study Area Boundary Map is a general visual representation of the Rural Exchange Boundaries and in no way changes the existing boundaries or agreements that are currently in place. Therefore, TriCounty requests the FCC to conform TriCounty's study boundary area so that it meets that of Carolina Telephone and Telegraph, LLC dba Centurylink, thereby eliminating the overlap.

Currently, MapCom is working to revise the current shapefile to meet the boundaries of Carolina Telephone and Telegraph, LLC dba Centurylink so that the current gaps that exist in the FCC Study Area Boundary will be eliminated. These new boundary changes will be submitted via a revised shapefile upload to the Study Area Boundary Data Collection Site later today.

Should you have any additional questions regarding this matter, please feel free to contact me at the above-listed address and telephone number.

Professionally,

A handwritten signature in black ink that reads "Gregory S. Coltrain". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Gregory S. Coltrain, CEO
TriCounty Telephone Membership Cooperative